

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE - NASHVILLE
DIVISION**

TERESA STRINGER, KAREN BROOKS,
WILLIAM PAPANIA, JAYNE NEWTON,
MENACHEM LANDA, ANDREA
ELIASON, BRANDON LANE, DEBBIE
O'CONNOR, MICHELLE WILLIAMS and
WAYNE BALNICKI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

NISSAN OF NORTH AMERICA, INC. and
NISSAN MOTOR CO., LTD.

Defendants.

Case No. 3:21-cv-00099

CLASS ACTION

**PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AGREEMENT,
CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASS, AND APPROVAL
OF CLASS NOTICE**

Judge William L. Campbell
Courtroom A826
Magistrate Judge Barbara D. Holmes
Courtroom 764

JURY TRIAL DEMANDED

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs, individually and on behalf of the proposed Settlement Class, hereby submit this unopposed Motion for Preliminary Approval of Class Action Settlement Agreement, Conditional Certification of Settlement Class, and Approval of Class Notice. Plaintiffs respectfully move this Honorable Court for entry of an Order: (1) granting preliminary approval of the Settlement; (2) approving the Notice Program and directing commencement of Notice as set forth in the Settlement and Notice Program; (3) conditionally certifying the Settlement Class for settlement purposes only; (4) approving the form and content of the Long Form Notice and Summary Notice, attached as Exhibits C and D to the Settlement, respectively; (5) appointing Plaintiffs as Class Representatives; (6) appointing Mark S. Greenstone of Greenstone Law APC, Marc L. Godino of Glancy Prongay & Murray LLP, and J. Gerard Stranch, IV of Branstetter Stranch & Jennings PLLC as Co-Lead Class Counsel; (7) appointing Stephen R. Basser of Barrack, Rodos & Bacine, Lawrence Deutsch of Berger Montague PC, and Ryan McDevitt of Keller Rohrback L.L.P., as Executive Committee Counsel; (8) appointing Kurtzman Carson Consultants, LLC as Settlement Administrator; and (9) scheduling a Final Fairness hearing to consider entry of a final order approving the Settlement, final certification of the Settlement Class for settlement purposes only, and the request for attorneys' fees, costs, and expenses, and Class Representative service awards.

This motion is based on Plaintiffs' Memorandum of Law in support thereof, the declarations of Mark S. Greenstone, Marc L. Godino, J. Gerard Stranch, IV, Stephen R. Basser, Lawrence Deutsch, Ryan McDevitt and Carla Peak in support thereof, the complete record in this action and such oral argument as the Court may consider in deciding this motion.

Dated: September 7, 2021

Respectfully submitted,

By: s/ J. Gerard Stranch, IV

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CERTIFICATE OF SERVICE

The undersigned certifies the foregoing document was filed with the Court's Case Management/Electronic Case Filing System, this 7th day of September, 2021, and served upon the following counsel:

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